

In the patent application, claims 3-41, 43, 44 and 47-52 are pending. In the office action, all pending claims are rejected.

On page 4 of the office action, claims 3, 16-22, 26-32 and 51-52 are rejected under 35 U.S.C. 102(b) as being anticipated by *Wee et al.* (U.S. Patent No. 6,104,441, hereafter referred to as *Wee*).

In rejecting these claims, the Examiner states that *Wee* discloses that
if the frame characteristic of that at least one video frame is the first characteristic (I frame), the bitstream is modified in the compressed domain based on specified editing parameters, but

if the frame characteristic of that at least one video frame is a second characteristic (P or B frame), then one or more preceding frames are decoded along with that at least one video frame, and the last of the decoded frames is encoded before the bitstream is modified (col. 11, lines 9-32).

Applicant respectfully disagrees.

As shown in Figure 4, *Wee* discloses that when a cut sequence is used to form the tail data stream (block 205), there are three situations: 1) to cut frames to begin with beginning I frame; 2) to convert beginning P frame to I frame; and 3) to convert beginning B frames to B_forward or I frames (block 207). Thus, if the first frame in a cut sequence to be appended to another image sequence is a P frame (such as the sequence P₄B₅P₆I₇B₉B₀... that is cut from an original sequence ...B₁B₂I₃P₄B₅P₆I₇B₉B₀...), then, before appending, P₄ is converted into I₄, but the preceding frames ...B₁B₂I₃ will remain the same. *Wee* does not disclose or suggest decoding one or more of the preceding frames ...B₁B₂I₃ and encoding the last of the decoded frames before the bitstream is modified. Likewise, if the first frame in a cut sequence to be appended to another image sequence is a B frame (such as the sequence B₉B₀... that is cut from an original sequence ...B₁B₂I₃P₄B₅P₆I₇B₉B₀...), then, before appending, B₉ is converted into B'₉ or I₉, but the preceding frames ...B₁B₂I₃P₄B₅P₆I₇ will remain the same. *Wee* does not disclose or

suggest decoding one or more of the preceding frames ...B₁B₂I₃P₄B₅P₆I₇ and encoding the last of the decoded frames before the bitstream is modified. Thus, according to *Wee*, when the frame characteristic of that at least one video frame is a second characteristic (P or B frame), none of the preceding frames are decoded along with that at least one video frame, and the last of the decoded frames is encoded before the bitstream is modified.

Wee does not disclose or suggest the limitation of claim 3.

For the above reasons, *Wee* fails to anticipate all the independent claims 3, 16 and 26. For the same reasons, *Wee* fails to anticipate dependent claims 17-22, 27-32 and 51-52.

On page 9, claims 4-11, 15, 35-41, 43-44 and 47-50 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Wee*, in view of *Naimpally et al.* (U.S. Patent No. 5,477,397, hereafter referred to as *Naimpally*). In rejecting those claims, the Examiner admitted that *Wee* fails to disclose converting the VLC coded video into a binary form prior to said modification, but pointed to *Naimpally* for disclosing converting VLC coded data into a binary form.

It is respectfully submitted that claims 35, 43 and 49 include the limitation that

If the frame characteristic of said at least one video frame is the second characteristic, at least one of the preceding video frames are decoded, the lost decoded frame is encoded prior to modifying part of the video frame data.

Wee fails to disclose this limitation.

For the above reasons, *Wee*, in view of *Naimpally*, fail to render claims 35, 43 and 49 obvious.

Claims 4-11, 15, 36-41, 44, 47, 48 and 50 are dependent from claims 3, 35, 43 and 49. For reasons regarding claims 3, 35, 43 and 49 above, claims 4-11, 15, 36-41, 44, 47, 48 and 50 are also distinguishable over the cited *Wee* and *Naimpally* references.

On page 14, claims 12-14 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Wee*, in view of *Naimpally*, and further in view of *Abe* (U.S. Patent No.

6,618,491). The Examiner cites *Abe* for disclosing combining the audio data with edited video data.

It is respectfully submitted that claims 12-14 are dependent from claim 3 and recite features not recited in claim 3. For reasons regarding claim 3 above, claims 12-14 are also distinguishable over the cited *Naimpally*, *Wee* and *Abe* references.

On page 15, claims 23-25 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Wee*, in view of *Abe*.

It is respectfully submitted that claims 23-25 are dependent from claim 16 and recite features not recited in claim 16. For reasons regarding claim 16 above, claims 23-25 are also distinguishable over the cited *Wee* and *Abe* references.

On page 16, claims 33 and 34 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Wee*, in view of *Ikonen* (U.S. Patent Application Publication No, 2003/0005329).

It is respectfully submitted that claims 33 and 34 are dependent from claim 26 and recite features not recited in claim 26. For reasons regarding claim 26 above, claims 33 and 34 are also distinguishable over the cited *Wee* and *Ikonen* references.

CONCLUSION

Claims 3-41, 43, 44 and 47-52 are allowable. Early allowance of claims 3-41, 43, 44 and 47-52 is earnestly solicited.

Respectfully submitted,



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